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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

NORTH AMERICAN TITLE INSURANCE  
COMPANY,

Defendant.

Case No.: 2:21-cv-00584-KJD-NJK

**STIPULATION TO STAY CASE**

Defendant North American Title Insurance Company (“NATIC”), on the one hand, and plaintiff Bank of America, N.A. (“BANA”), on the other hand, hereby stipulate and agree as follows:

This is one of many actions pending before the Nevada state and federal courts involving a Lender’s alleged entitlement to coverage under a title insurance policy following an HOA foreclosure sale. BANA filed this specific action in Nevada’s Eighth District Court on April 8, 2021;

NATIC removed this case to the United States District Court on April 9, 2021. The parties have since engaged with one another about the possibility of settling this and other similarly situated matters involving these specific parties. Due to the number of claims involved,

the parties anticipate it may take several months to complete negotiations. In order to preserve resources during this process, the parties stipulate and agree that this matter should be stayed.

**NOW THEREFORE**, BANA and NATIC hereby **STIPULATE** and **AGREE** as follows:

1. This action shall be **STAYED**;
2. Either Party may move to lift this stay at any time.
3. The Parties shall provide the District Court with a joint status update regarding the status of their settlement negotiations ninety (90) days after entry of the order on this stipulation.

Dated: April 14, 2021

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair

KEVIN S. SINCLAIR  
Attorneys for Defendants  
NORTH AMERICAN TITLE INSURANCE  
COMPANY

Dated: April 14, 2021

WRIGHT, FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner

DARREN T. BRENNER  
Attorneys for Plaintiff  
BANK OF AMERICA, N.A.

**IT IS SO ORDERED.**

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

KENT J. DAWSON  
UNITED STATES DISTRICT JUDGE